

**John Bal**

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May 21, 2018

Honorable Debra C. Freeman  
United States District Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *Bal v. Manhattan Democratic Party, et al.*  
Docket No. 16 Civ. 02416 (PKC) (DCF)**

Honorable Freeman:

I am Plaintiff *pro se* in the above matter. As a result of Defendants Keith Wright's and Cathleen McCadden's failure to comply with the Court's discovery order of March 14, 2018 (Order) (Dkt. 76), on May 18, 2018, I wrote Your Honor for assistance (Plaintiff's letter) (Dkt. 88). Plaintiff's letter specifically identified the interrogatory and document issues in the Order that Defendants failed to comply.

Defendants' letter to Your Honor dated May 18, 2018 (Defendants' letter) (Dkt. 90) did not address *any* of the issues raised in Plaintiff's letter. Instead, Defendants' single-page letter contained the following inaccuracies that, perhaps inadvertently, are misleading:

*Firstly*, Defendants' letter inaccurately claimed that I am seeking "additional discovery." To the contrary, I am *not* seeking additional discovery. I am seeking Defendants' compliance with the Order.

*Secondly*, Defendants' attorney inaccurately claimed that "Defendants have complied with all Orders of the Court and all of Plaintiff's requests for discovery." As demonstrated in Plaintiff's letter to Your Honor, Defendants have neither complied with the Order nor with Plaintiff's discovery requests.

*Thirdly*, Defendants' attorney inaccurately claimed that "Plaintiff has asked me on several occasions to comply with discovery, and on each occasion, I've simply asked Plaintiff what information he might need. On each occasion Plaintiff has simply said that Defendants must comply fully" and "Plaintiff has never stated that any particular issue has gone unaddressed." Prior to asking Your Honor for assistance, Defendants' attorney was provided with the specific unaddressed interrogatory and discovery issues (which are identical to those in Plaintiff's letter) on April 6, 2018, April 7, 2018, May 2, 2018, May 7, 2018, and May 15, 2018.

On May 19, 2018, I sent an email to Defendants' attorney. This email explained that "I would very much prefer not to burden the Court with these discovery issues." To avoid burdening the Court, I asked in the email that Defendants' attorney, by May 25, 2018, send a revised letter to the Court correcting the above inaccuracies and, in view of Defendants' attorney's claim that "Defendants have complied with all Orders of the Court and all of Plaintiff's requests for discovery," to re-send Defendants' responses, if they exist, to the discovery requests that I made on May 15, 2018 (by email and by telephone), May 7, 2018 (by email and by telephone), May 2, 2018 (by email), May 1, 2018 (by email and by telephone), April 26, 2018 (by email), April 25, 2018 (by email), April 18, 2018 (by email), April 10, 2018 (by email), April 7, 2018 (by email), and April 6, 2018 (by email).

Respectfully submitted,

*John Bal*

JB/